REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 1-27 and 39-53 are pending in the application. Claims 1-27 and 39-53 have been rejected.

CLAIM REJECTIONS

35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 1-27, 39-41 and 43-47 under 35 U.S.C. § 103(a), as being unpatentable over Volcani et al. (US 2003/0212655) in view of Carlgren et al. (US 4,456,973) and further in view of Livowsky (US 6,594,657). Applicant respectfully traverses all the rejection of the pending claims over Volcani in view of Carlgren and further in view of Livowsky. Applicant respectfully asserts that the Examiner failed to establish a prima facie case of obviousness on the grounds that the Examiner: (1) failed to show any motivation or suggestion to combine the teachings of the three unrelated cited references; and (2) even if the Examiner had shown motivation to combine the cited references, **the combined teachings of all three references neither teaches nor suggests all the limitations of independent claims 1, 14, 27 and 39**. More specifically, Applicant respectfully asserts that the three cited references, either alone or in combination, neither teach nor suggest the limitation of using a **"user specific profile which is based on writing provided by the user" when suggesting alternative phrasing**. Aside and apart from the

fact that the Examiner has not shown any motivation to combine these references, it is not clear how one could combine the teachings of the primary (Volcani) and secondary (Carlgren) references with each other and with the teachings of the tertiary reference (Livowsky) to form a § 103 rejection. The Examiner admits that the teachings of the primary and secondary references neither teach nor suggest a "**user specific profile**" generated by an analysis of the user's own writing samples. He relies on the tertiary reference for this limitation. However, even if combining the reference were proper, a careful reading of the tertiary reference also leads one to the conclusion that it fails to teach or suggest a "**user specific profile" for the purpose of language enhancement, generated by an analysis of the user's own writing samples.** Instead, the Livowsky reference teaches a user specific profile for **assisting in databases search queries** based on the user's prior similar queries – no mention or suggestion of a profile being based on provided writing samples.

More specifically, Independent claims 1, 14, 27 and 39, respectively, recite:

1) "A method for language enhancement, comprising:

receiving over a data network data representing text from a user;

computationally **identifying grammatical constructs within the text**;

computationally **enhancing the text** by determining at least one alternate text portion **based on a user specific profile** for at least one original portion of the text, the alternate text portion being consistent with the grammatical constructs of the original portion and having substantially the same meaning as the original portion but conveying a different impression; and

wherein the user specific profile is based on writing provided by the user."

14) "A language enhancement apparatus, comprising:

a memory for storing text from a user;

a natural language parser for **identifying grammatical constructs within the text;**

a natural language enricher for **enhancing the text** by determining at least one alternate text portion **based on a user specific profile** for at least one original portion of

the text, the alternate text portion being consistent with the grammatical constructs of the original portion and having substantially the same meaning as the original portion but conveying a different impression; and

wherein the user specific profile is based on writing provided by the user."

27) "A computer-readable storage medium storing program code for causing a computer to perform the steps of:

receiving text from a user;

identifying grammatical constructs within the text;

enhancing the received text by determining at least one alternate text portion **based on a user specific profile** for at least one original portion of the text, the alternate text portion being consistent with the grammatical constructs of the original portion, and having substantially the same meaning as the original portion but conveying a different impression; and

wherein the user specific profile is based on writing provided by the user."

39) "A web service comprising:

receiving over a data network data representing a request including one or more sentences of natural language text;

algorithmically deriving at least one suggestion for **enhancing the one or more sentences based on a user specific profile,** the at least one suggestion-conveying a different impression but retaining substantially the same meaning, and **the user specific profile being based on writing provided by the user;** and

returning a response including the at least one suggestion; wherein returning a response includes transmitting data over a data network, which data may be rendered by a client application to show text indicative of the response."

Whereas, the primary reference generally teaches:

"A computer program that indicates lexical impact of various words and phrases in a text, measures the overall lexical impact of the text, and suggests alternatives for various words and phrases of the text. The computer program may include a ranked thesaurus for listing alternative words and phrases (e.g., synonyms, antonyms, related), along with an indication

of their relative lexical impacts. The thesaurus may alternatively rank words and phrases according to other ranking systems." (Volcani Abstract)

And the secondary reference generally teaches:

"A system for proofreading a text document and automatically detecting and replacing text words in the document which exceed a predetermined understandability level for the documents intended audience. Text words and synonyms are stored in a dictionary which includes an understandability code for each word based statistically on textbook grade levels. The operator enters a grade level code into the system for the intended document audience. The system scans the document for words which exceed the desired grade level, highlights those words on the system display and prompts the operator with synonyms which can be used to replace the highlighted word. The operator may select a desired replacement synonym by placing the system cursor underneath the word and depressing and enter key from the system keyboard." (Carlgren Abstract)

And the tertiary reference generally teaches:

"A system and method for **enhancing an online support service** using a natural language interface. The online support system is connected to a user computer by the Internet or other communication links, and is **used by a user to search and retrieve information from a database**. The system provides an interface for online support services that is user friendly and accepts natural language queries. The natural language interface processes misspelled queries and queries having syntax errors. Furthermore, the natural language interface allows the system to extract information from prior sessions and upgrade its own vocabulary and knowledge database. The method comprises the steps of accessing a server computer by the user computer, entering a query in a natural language form, processing the query by the natural language interface coupled to the server computer, searching the database coupled to the server computer using the processed query, retrieving results from the database, and providing the results to the user. The system comprises a server computer coupled to the user computer, the server computer configured to receive a query in a natural language form from the user computer, a natural language interface coupled to the server computer, the natural language interface being configured to process the query, and a database coupled to the

server computer and the natural language interface, the database being adapted to store information, wherein the natural language interface searches the database using the processed query and provides the results to the user computer through the server computer." (Livowsky Abstract)

In view of the above excerpts cited from the references, Applicant respectfully asserts that the Examiner failed to show a suggestion or motivation to combine the teachings of the cited references at the time of the invention. It is difficult to fathom how the teachings of these references could be combined at all, let alone to support a 103 rejection of the pending claims.

After careful review of the cited references, Applicant respectfully asserts that the Examiner has completely misinterpreted Livowsky's teachings and has erroneously inferred subject matter that is neither taught nor suggested therein. More specifically, the Examiner clearly and categorically states in the Office Action that *"Volcani and Carlgren lack wherein the user specific profile is based on the writing by the user. However Livowsky teaches user specific profile based on writing by the user (C.2 lines 35-47 – his user query, in natural language, C.5 lines 26-44-his user created file, as his profile, indicated specific user unique writing style)*. Applicant, however, respectfully submits that a complete reading of the Livowsky reference indicates that it teaches a **system and method for enhancing online search capabilities and not for enhancing language** in a textual document. To the extent the Livowsky reference mentions a user specific profile, it is a profile based on prior searches performed by a user, and not based on any writing (samples) provided by the user. Furthermore it is not clear to the Applicant why or how the Examiner is supporting his combination of Livowsky with Volcani and Carlgren as part of an erroneous attempt to form a § 103 rejection.

Upon reading Livowsky it is clear that the **"user specific profile"** of Livowsky relates to a profile based on previous search terms entered by the user, which profile is used for enhancing database searches.

The pending independent claims recite (e.g. claim 1) **language enhancement** through "...*(a)* **computationally identifying grammatical constructs** within the text...[and] *(b)* **computationally enhancing the received text** by **determining at least one alternate text portion based on a user specific profile**...". Whereas, Livowsky teaches *"an online*

support system and method using a natural language interface. The system can be used, for example, to obtain assistance in the installation and trouble-shooting of computers, appliances, and other consumer goods." The natural language interface of Livowsky "...
which is coupled to the server computer 312, allows the operator to form the queries in a natural language form, rather than in conventional search terms. The natural language interface 316 processes the queries and searches the database 320 for an answer. The natural language interface 316 retrieves an answer from the database 320, and provides the answer to the operator through the server computer 312. The operator then relays the answer to the user" (Livowsky; Column 3, lines 59-67) ...... *"The system creates a preference file as the user is registered. The preference file may be implemented in the system server or the client server. The preference file stores information about to the user, including, but not limited to, information about the user's own natural language vocabulary, writing style, common spelling errors, use of synonyms, etc. The preference file is updated as new information is automatically learned from the user."* (Livowsky; Column 5, lines 35-44) The preference file is **not used for enhancing language but rather for synonym and phonetic approximation** as discussed at Livowsky Column 5, lines 8-35 to assist in providing broader search results, **nor is the preference file based on writing samples provided by the user**.

Furthermore, as previously discussed and as stated by the Examiner, the combination of the primary and secondary references lacks the teaching of a user specific profile **which is based on writing samples provided by the user**. The use of Livowsky as a prior art reference does not add any valid sustainable argument to uphold a § 103 rejection, and certainly does not add the limitation of a user specific profile which is based on writing provided by the user for the purpose of language enhancement. Citing Livowsky to support the 103 rejection is at a minimum far fetched, and can be seen as showing either a total miscomprehension of Livowsky's teachings or a misguided attempt by the Examiner to combine non-relevant references in his attempt to form a 103 rejection against the pending independent claims.

The Examiner also rejected claim 42 under 35 U.S.C. § 103(a), as being unpatentable over Volcani et al., in view of Carlgren et al. and further in view of Livowsky, and further in view of Pickover et al. (US 2003/0130898). Furthermore, The Examiner rejected claims 48-
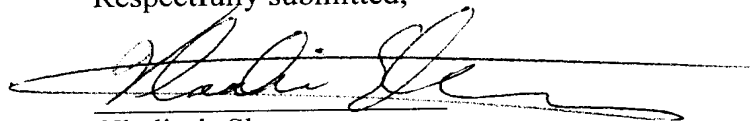
52 under 35 U.S.C. § 103(a), as being unpatentable over Volcani et al., in view of Carlgren et al. and further in view of Livowsky, and further in view of Kinder et al. (US 2003/0212541). Finally, The Examiner rejected claim 53 under 35 U.S.C. § 103(a), as being unpatentable over Volcani et al., in view of Carlgren et al. and further in view of Livowsky, and further in view of Anderson et al. (US 5,678,053). Applicant respectfully traverses the above rejections of claims over Volcani in view of Carlgren and further in view of Livowsky, and further in view, respectively, of Pickover, Kinder and Anderson, because a prima facie case of obviousness has not been established. Furthermore, in light of the foregoing remarks regarding the 103 rejections of the independent claims, Applicant respectfully asserts that claims 42, 48-52 and 53 are considered allowable under 35 U.S.C. § 103 by virtue of their dependence on allowable base claims.

In view of the foregoing clarifications and remarks, all the pending claims are considered to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Response, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Respectfully submitted,

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